

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Jessie James Frye
Cynthia Lynn Frye, Debtors**

**Case No. 21-50908-KMS
CHAPTER 13**

NOTICE

Debtors have filed papers with the court to suspend their bankruptcy payments.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to suspend the payments, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Suspend Plan Payments.

Date: April 16, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
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**IN THE UNITED STATES BANKRUPTCY COURT
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MOTION TO SUSPEND PLAN PAYMENTS

COME NOW, Debtors, by and through counsel, and move this Court to suspend their Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtors are requesting this Honorable Court to suspend any past due plan payments and two (2) months of plan payments, including any ongoing mortgage payments being paid through the plan, during the months of June and July 2025.
3. Debtors are in the process of transitioning to new employment, which requires them to relocate from Madison, Alabama to Dallas, Texas. As a result, they will incur relocation expenses and will be temporarily unable to make their monthly plan payments. Debtors will be able to resume making payments beginning in August 2025.
4. Debtors are requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments.

WHEREFORE, Debtors pray for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
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P.O. Box 13767
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JESSIE JAMES FRYE
CYNTHIA LYNN FRYE

CASE NO: 21-50908-KMS

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/16/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Suspend

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/16/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. 103469

The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JESSIE JAMES FRYE
CYNTHIA LYNN FRYE

CASE NO: 21-50908-KMS

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 4/16/2025, a copy of the following documents, described below,

Notice and Motion to Suspend

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/16/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 21-50908-KMS
SOUTHERN DISTRICT OF MISSISSIPPI
WED APR 16 9-2-18 PST 2025

(P)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

LVNV FUNDING LLC
PO BOX 10587
GREENVILLE SC 29603-0587

~~EXCLUDE~~

~~(U)NATIONSTAR MORTGAGE LLC DBA MR
COOPER~~

NAVY FEDERAL CREDIT UNION
1715 AARON BRENNER DRIVE SUITE 800
MEMPHIS TN 38120-1445

RESURGENT RECEIVABLES LLC
CO RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

~~EXCLUDE~~

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501-2036~~

1ST FRANKLIN FINANCIAL
3179 MALLETT RD
STE 20
DIBERVILLE MS 39540-9303

1ST FRANKLIN FINANCIAL
421 MEMORIAL BOULEVARD
PICAYUNE MS 39466-5548

1ST FRANKLIN FINANCIAL CORPORATION
ATTN ADMINISTRATIVE SERVICES
PO BOX 880
TOCCOA GA 30577-0880

AAFES
3911 WALTON WALKER
DALLAS TX 75236-1598

ARMY AIR FORCE EXCHANGE SERVICES
ATTENTION GCG
3911 S WALTON WALKER BLVD
DALLAS TX 75236-1509

BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

BANK OF AMERICA NA
P O BOX 982284
EL PASO TX 79998-2284

CREDIT FIRST NA
PO BOX 818011
CLEVELAND OHIO 44181-8011

CAPITAL ONE NA
BY AMERICAN INFOSOURCE AS AGENT
CAPITAL ONE BANK USA NA
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

CASH NET USA
200 WEST JACKSON BLVD
14TH FLOOR
CHICAGO IL 60606-6929

CASHNETUSA
175 W JACKSON BLVD
SUITE 1000
CHICAGO IL 60604-2863

CHASE CARD SERVICES
PO BOX 15369
WILMINGTON DE 19850-5369

CITIBANK NORTH AMERICA
PO BOX 6497
SIOUX FALLS SD 57117-6497

CREDIT FIRST NATIONAL
PO BOX 81315
CLEVELAND OH 44181-0315

CREDIT ONE BANK
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LAS VEGAS NV 89193-8872

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FOR NATIONSTAR MORTGAGE LLC DBA MR COOP
LOGS LEGAL GROUP LLP
1080 RIVER OAKS DRIVE SUITE B-202
FLOWOOD MS 39232-7603

GULFCO OF MISSISSIPPI LLC
PO BOX 320001
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HMC GROUP
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WESTLAKE OH 44145-1179

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~~~(D) (P) JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999~~JPMORGAN CHASE BANK NA
SBMT CHASE BANK USA NA
CO ROBERTSON ANSCHUTZ SCHNEID PL
6409 CONGRESS AVENUE SUITE 100
BOCA RATON FL 33487-2853~~EXCLUDE~~~~(D) LVNV FUNDING LLC
PO BOX 10587
GREENVILLE SC 29603-0587~~LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587MS DEPT OF REVENUE
BANKRUPTCY SECTION
PO BOX 22808
JACKSON MS 39225-2808MEMORIAL EMERGENCY PHY
PO BOX 2080
KILMARNOCK VA 22482-2080MEMORIAL EMERGENCY PHY
PO BOX 555
BILOXI MS 39533-0555MEMORIAL HOSPITAL
PO BOX 1810
GULFPORT MS 39502-1810MR COOPER
350 HIGHLAND
HOUSTON TX 77009-6623NATIONSTAR MORTGAGE LLC DBA MR COOPER
PO BOX 619096
DALLAS TX 75261-9096NAVIENT
PO BOX 3229
WILMINGTON DE 19804-0229NAVY FCU
820 FOLLIN LANE
VIENNA VA 22180-4907NAVY FEDERAL CREDIT UN
PO BOX 3100
MERRIFIELD VA 22119-3100NAVY FEDERAL CREDIT UNION
PO BOX 3000
MERRIFIELD VA 22119-3000~~EXCLUDE~~~~(D) NAVY FEDERAL CREDIT UNION
PO BOX 3000
MERRIFIELD VA 22119-3000~~NELNET
PO BOX 82561
LINCOLN NE 68501-2561NELNET ON BEHALF OF
ASCENDIUM EDUCATION SOLUTIONS INC
PO BOX 8961
MADISON WI 53708-8961NETCREDIT
175 W JACKSON BLVD
SUITE 1000
CHICAGO IL 60604-2863PAIN TREATMENT CENTER
105 ASBURY CIR
B
HATTIESBURG MS 39402-1397(P) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067RESURGENT RECEIVABLES LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587SOUTH MS COLLECTION SE
PO BOX 1511
PASCAGOULA MS 39568-1511SYNCHRONY BANK
PO BOX 105972
ATLANTA GA 30348-5972SYNCHRONY BANK
PO BOX 956005
ORLANDO FL 32896-0001SYNCHRONY BANK
PO BOX 965015
ORLANDO FL 32896-5015SYNCHRONY BANK
CO PRA RECEIVABLES MANAGEMENT LLC
PO BOX 41021
NORFOLK VA 23541-1021(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

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SAN ANTONIO TX 78263

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~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE C 430
JACKSON MS 39201 5022~~

VERIZON
BY AMERICAN INFOSOURCE AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

CYNTHIA LYNN FRYE
116 MILL CREEK CROSSING
MADISON AL 35758-7200

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